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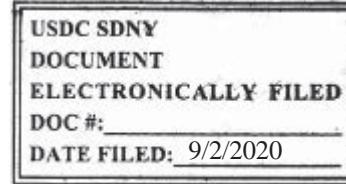
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August 20, 2020

Via CM/ECF

Honorable Alison J. Nathan
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007



***Re: United States v. Roberto Rodriguez, Case No. 17-cr-00503-AJN
Motion to Modify Conditions of Supervised Release***

Dear Judge Nathan:

On behalf of Defendant Roberto Rodriguez, I write to request modification of the conditions of his Supervised Release, to permit work-related travel throughout the State of Florida.

Mr. Rodriguez was sentenced to a year and a day of incarceration, followed by 2 years of Supervised Release. He was released to a halfway house on January 9, 2020, and has been at home, on Supervised Release since May 11, 2020.

Mr. Rodriguez remains employed with Above & Beyond Learning, the same company he was with pre-arrest. In a letter which the president of Above & Beyond submitted to counsel, he explains that Mr. Rodriguez is responsible for managing tutorial programs throughout Florida, which requires that he travel periodically to various parts of Florida located in the Middle and Northern Districts (Attached as Exhibit A). He therefore moves the Court to modify the default condition that restricts his travel to the Southern District, where he resides.

Mr. Rodriguez was afforded similar accommodation while on bond.

Undersigned attempted to contact Mr. Rodriguez' supervision Probation Officer to learn his position on this motion, but received no response. However, Mr. Rodriguez affirms that, based on discussions had, he is of the confident understanding that probation has no objection to the relief sought.

Undersigned's effort to confer with Assistant United States Attorney Andrea Grisworld was likewise unsuccessful.

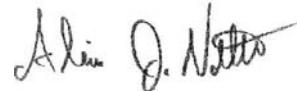
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For the foregoing reasons, Mr. Rodriguez respectfully moves the Court to modify the conditions of his Supervised Release to permit travel work-related travel throughout the State of Florida.

SO ORDERED.

Thank you for your consideration of this request.

Sincerely,



8/26/2020

/s/ David A. Howard
David A. Howard, Esq.
Attorney for Defendant Roberto Rodriguez

DAH/gr

Copy to: AUSA, Andrea Griswold
 U.S. Probation

EXHIBIT A



14118 SW 288 St
Homestead, FL 33033
(305) 499-9333
www.above-and-beyondlearning.com

August 8th, 2020

To whom it may concern,

This letter is to certify that Mr. Roberto Rodriguez works for Above & Beyond Learning, Inc. managing tutoring programs throughout the State of Florida with specific location in Miami, Naples, and Tampa. His duties include interviewing and hiring staff, establishing program operations and monthly oversight to ensure program fidelity. Due to these work requirements Mr. Rodriguez may be required to travel throughout the State of Florida with little to no notice. If you have any questions, feel free to contact me at 786-525-9226.

Thank you,

Alejandro Regalado
President
Above & Beyond Learning, Inc.